

Exhibit 30

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,
SMARTMATIC INTERNATIONAL
HOLDING B.V., and SGO
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-JMB-JFD

**DECLARATION OF JONAH BERGER IN SUPPORT OF PLAINTIFFS'
MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Dr. Jonah Berger, pursuant to 28 U.S.C. § 1746, do hereby declare as follows:

1. I am Dr. Jonah Berger. I am over 18 years of age and fully competent to make this Declaration. To the best of my knowledge, information, and belief, the statements made herein are true and accurate.

2. This Declaration is submitted in support of Plaintiffs' Motion for Summary Judgment.

3. I am a Marketing professor at the Wharton School at the University of Pennsylvania. I received my Ph.D. in Marketing from the Graduate School of Business at Stanford University and my B.A. in Human Judgment and Decision Making, also from Stanford University.

4. I have been retained by counsel for Smartmatic to, among other things, analyze the size and nature of the audience reached by Mr. Lindell's statements and publications regarding Smartmatic. As part of my assignment, I was asked to identify statements made by Mr. Lindell pertaining to Smartmatic and to evaluate their publication and dissemination. In this Declaration, I set forth my findings regarding the publication of several of Mr. Lindell's documentaries and one of his live events:

5. On February 5, 2021, Mr. Lindell released a documentary named *Absolute Proof*. This documentary was aired on OANN a total of thirteen times from February 5–8, 2021. The documentary was also posted to other platforms, including Vimeo, Rumble, YouTube around the same time. By the end of 2021, *Absolute Proof* was also available on The American Report, USAWatchdog.com, FrankSpeech.com, and MichaelJLindell.com.

6. On April 3, 2021, Mr. Lindell released a documentary named *Scientific Proof*. This documentary was published on LindellTV.com and Rumble.com.

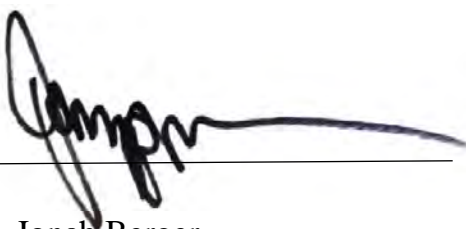
7. On April 22, 2021, Mr. Lindell released a documentary named *Absolute Interference*. This documentary was published on FrankSpeech.com and Rumble.com. FrankSpeech.com was launched by Mr. Lindell in April 2021.

8. On June 5, 2021, Mr. Lindell released a documentary named *Absolutely 9-0*. This documentary was published on at least FrankSpeech.com and broadcast on OANN.

9. On August 10 through August 12, 2021, Mr. Lindell hosted a live Cyber Symposium event in South Dakota. The event was also live streamed on FrankSpeech.com.

10. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: November 11, 2024



Dr. Jonah Berger